

**REMARKS**

This Application has been carefully reviewed in light of the Office Action mailed August 7, 2006 (“Office Action”). At the time of the Office Action, Claims 1-37 were pending in the application. In the Office Action, the Examiner rejects Claims 1-37. Applicant amends various claims to further prosecution and do not admit that any of these amendments are required as a result of any cited art reference.

**Claim Rejections - 35 U.S.C. § 102**

The Examiner rejects Claims 1-7 and 13-37 under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,070,170 issued to Friske, et al. (“*Friske*”). Applicant amends Claims 1-7 and 1-37. Applicant respectfully requests reconsideration and allowance of Claims 1-7 and 13-37.

Amended Claim 1 recites, in part, “A method for logging changes that are made during a reorganization process, comprising . . . identifying changes to the plurality of objects that are made during a reorganization process; for each change, determining whether the change affects an object being reorganized; [and] creating, during the reorganization process, a log file comprising log records, wherein the log records are associated with only those changes that are determined to affect an object being reorganized.”

In rejecting Claim 1, the Examiner incorrectly equates the log file of the current invention with log records of *Friske*. As explained in more detail below, the log records of *Friske* are not the same as the log file in the current invention. Even if the Examiner were correct, a fundamental distinction between the two exists. The log records of *Friske* are created *after* the reorganization process, whereas the log file of the present application is created “during the reorganization process.” (Amended Claim 1)

The language in *Friske* relied upon by the Examiner describes only how the log records are used. It does not disclose at all how the records are created or what is contained in the log file from which they derive, if indeed they derive from a single log file or a log file at all. *Friske* only states that the records contain updates to the data objects made during reorganization and that the records are applied to the new data set. The present application, however, describes “[a] method for *logging* changes that are made during a reorganization process.” (Currently Amended Claim 1) (emphasis added). *Friske* does not describe how the changes made during a reorganization process are logged to a log file; it only describes how

the log records are used. In other words, the language in *Friske* quoted by the Examiner discloses only part of the story. In fact, only Figure 4 of *Friske* provides any insight into the process of creating the log records. Specifically, “[l]og records are applied to the target data set in the shadow location in task 418[, the log apply,] which allows any changes to the original data set which occurred while the reorganization was taking place to be applied to the reorganized target data set.” *Friske* does not directly disclose the log apply task, but it states that “[t]he log apply of task 418 is disclosed in U.S. patent application Ser. No. 08/366,564 (parent application) . . . and is further discussed in U.S. patent application Ser. No. 08/457,150 (child application), a continuation of the patent application filed Jun. 1, 1995 and entitled “Interaction Between Application of a Log and Maintenance of a Table That Maps Record Identifiers During Online Reorganization of a Database . . . .” *Friske* incorporates these applications by reference. A patent, U.S. Patent No. 6,070,170 issued to Sockut, et al. (“*Sockut*”), for the child application was granted February 24, 1998. Applicant disclosed *Sockut* in a prior IDS.

As stated above, *Friske* tells only part of the story, picking up *after* the log records have been created and are applied. *Sockut* fills in the gap left by *Friske* describing how the log records came into existence and the nature of the log file containing the log records. At the outset, *Sockut* makes clear throughout the reference that “[t]he DBMS uses its normal facilities to record writing, which occurs during reorganization, in a log. The reorganization . . . reads the log (that has been written to during reorganization) and processes the log to the new area to bring the new area up to date.” (See *Sockut* at Abstract, col. 4, ll.3-8; see also col.7, ll.16-17). The log, which was created using the “normal” database facilities is then processed *after* the reorganization. The log apply steps 506 and 510, which process the log, are described in Column 12, Line 50 through Column 13, Line 7 of *Sockut*. The processing is as follows: (1) sort log by old RID; (2) “Translation: copy the subset of the log that applies to the area being reorganized and [have been updated during reorganization]”; (3) sort the translated log file by new RID; and (4) apply the sorted, translated log file to the new data area.

There exists between the present invention and the log apply of *Friske* (described in detail in *Sockut*) two fundamental differences in how changes made during reorganization are logged: (1) *Friske* teaches using a log file created *after* reorganization, whereas the present invention recites, in part, “creating, during the reorganization process, a log file comprising

log records[;]" (Currently Amended Claim 1) and (2) *Friske* updates from a "sorted," "translated" version of the "normal" log file, whereas the log file of Claim 1 in no way derives from a "normal" log file.

Amended Claim 1 recites, in part, "A method for logging changes that are made during a reorganization process, comprising . . . identifying changes to the plurality of objects that are made during a reorganization process; for each change, determining whether the change affects an object being reorganized; [and] creating, during the reorganization process, a log file comprising log records, wherein the log records are associated with only those changes that are determined to affect an object being reorganized." *Friske* fails to teach these elements. For at least these reasons, Applicant respectfully traverses the Examiner's rejection and requests reconsideration and allowance of Claims 1-7 and 13-37.

#### **Claim Rejections - 35 U.S.C. § 103**

The Examiner rejects Claims 8-12 under 35 U.S.C. 103(a) as being unpatentable over *Friske* in view of U.S. Patent No. 5,485,608 issued to Lomet, et al. ("Lomet"). Claim 8 is currently amended. Applicant respectfully requests reconsideration and allowance of Claims 8-12.

Claim 8 recites, "A method for logging changes by a database management system, comprising: identifying changes to a plurality of objects that are made during a reorganization process; creating a log record based on a particular change; determining whether the particular change affects an object being reorganized; storing the log record in a first log file recording selected changes only if the particular change is determined to affect an object being reorganized; and storing the log record in a second log file regardless of whether the change is determined to affect an object being reorganized." As shown above, *Friske* does not teach, suggest, or disclose at least, "storing the log record in a first log file recording selected changes only if the particular change is determined to affect an object being reorganized." *Lomet* does not make up for the deficiencies of *Friske*. For at least these reasons, Applicant respectfully requests reconsideration and allowance of Claim 8. Claims 9-12 depend from Claim 8 shown above to be allowable. For at least these reasons, Applicant respectfully requests reconsideration and allowance of Claims 9-12.

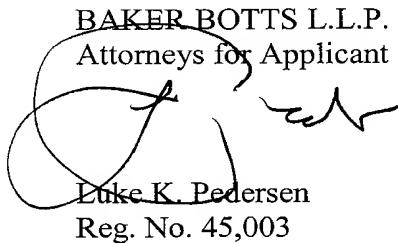
**CONCLUSION**

Applicant has made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicant respectfully requests full allowance of all pending claims.

If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Luke K. Pedersen, Attorney for Applicant, at the Examiner's convenience at (214) 953-6655.

The Commissioner is hereby authorized to charge the \$120.00 one month extension of time fee and to charge any deficiency or credit any overpayment to Deposit Account No. 02-0384 of BAKER BOTTS L.L.P.

Respectfully submitted,

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Date: December 6, 2006

**CORRESPONDENCE ADDRESS:**

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